

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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Mail Processing Network Rationalization  
Service Changes, 2012

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Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
SUPPLEMENTAL MOTION FOR ACCESS TO NON-PUBLIC INFORMATION  
IDENTIFIED AS USPS-LR-N2012-1/NP29  
(July 17, 2012)

On July 6, 2012, American Postal Workers Union, AFL-CIO (APWU), filed a Motion for Access to Non-Public Information Identified as USPS-LR-N2012-1/NP29. Accompanying this motion were the signed certifications of several APWU representatives, consultants and attorneys. However, one additional APWU consultant was unable to complete his Statement of Compliance with Protective Conditions Certifications pursuant to 30 CFR 3007.40(b) in time to be included in the filing. A certification applicable to USPS-LR-N2012-1/NP29, for the following individual has now been completed as follows:

Sheppard Vars  
Shorter Cycles  
Consultant for American Postal Workers Union, AFL-CIO

A copy of this Certification is attached hereto.

The Postal Service did not object to APWU's original Motion for Access to USPS-LR-N2012-1. This Motion was subsequently granted on July 12, 2012. For these reasons and for those reasons stated in our July 6, 2012, Motion for Access, APWU respectfully requests that the above named individual be granted immediate access to the non-public Library Reference USPS-LR-N2012/1NP29.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certification today by email.

**Conclusion**

For the forgoing reasons and the reasons stated in APWU's Motion for Access, filed July 6, 2012, access to Library Reference USPS-LR-N2012-1/NP29 should be immediately granted to the above named individual.

Respectfully submitted,

Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

### CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP29** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name

Sheppard Vars

Firm

Shorter Cycles LLC

Title

Sr Consultant

Representing

APWU

Signature

Sheppard Vars

Date

July 13, 2012